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October 3, 1997

Mr. Rick Woodard
Calfed Bay-Delta Program
1416 Ninth Street, Suite 1155
Sacramento, CA 95814

**SUBJECT: NOVARTIS CROP PROTECTION, INC., COMMENTS ON
CALFED WATER QUALITY PROGRAM "COMPONENT
REPORT" DRAFT AUGUST 1997: GOOD WATER QUALITY
FOR ALL BENEFICIAL USES**

Dear Mr. Woodard,

Novartis Crop Protection, Inc., has reviewed the above report and would like to submit the following comments, for the record:

1. The report does a good job of outlining the overall problems affecting water quality.
2. References to organics/pesticides seem to be overrated. The report does not differentiate between products which are no longer registered or used (i.e., DDT, toxaphene, chlordane) and other pesticides currently registered. It lumps the older chlorinated hydrocarbons, which have significantly different environment effects and degradate properties, with the currently registered products. The inference being that all these products behave the same.
3. Page 3-3, we would like to see some explanation of the TIE process and some explanation of the limitations of this process with regards to Ceriodaphnia and organophosphate insecticides. Novartis has completed a comprehensive "*Ecological Risk Assessment of Diazinon in the Sacramento and San Joaquin River Basins*". This report has been sent to you, under a separate cover.

Novartis Crop Protection Comments on
CalFed Water Quality Program "Component
Report" Draft August 1997: Good Water
Quality for all Beneficial Uses
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4. Page 5-2, Novartis is not aware that the lower Sacramento River (Red Bluff to the Delta), the American River and the lower Feather Rivers are listed as "impaired" under Section 303(d) of the CWA for diazinon and chlorpyrifos. We would again have you refer to the ecological risk assessment. We would also disagree with the statement in the third paragraph that these products bioaccumulate and impair recreational fishing.
5. Sacramento Regional Waste Water Treatment Plant is not the only facility monitoring for diazinon and chlorpyrifos (page 6-4).
6. Page 6-5, Novartis Crop Protection, Inc. (formerly Ciba Crop Protection), Dow Elanco and others have launched a massive, comprehensive "Best Management Practices (BMPs) for Dormant Sprays" education program. This education program has been aimed at growers, pest control advisors, consultants, and University of California farm advisors to reduce the amount of dormant spray runoff. The California Department of Pesticide Regulation has done considerable research (*Reducing Dormant Spray Runoff from Orchards* by L.J. Ross, K.P. Bennett, K.D. Kim, K. Hefner, and J. Hernandez - July 1997, and is available from DPR). This research shows that the BMPs the industry is proposing will reduce the runoff from orchards. I have attached a copy of the education brochure we are currently using. I believe this program should be listed on page 6-5, along with the other stewardship programs.
7. Pages 7-2 and 7-3 should also recognize the existing dormant spray BMP program. On urban issues, Novartis has actively pursued label changes and warnings on our urban used diazinon to warn consumers to stop disposing of excess product down the drains and is working with the Urban Pesticide Committee to reduce the runoff and inappropriate disposal of our products.
8. Lastly, we would like to correct an inaccuracy on page C-22. Diazinon is not registered (legally used) on alfalfa. Furthermore, very little diazinon is used on almond orchards in May.

Novartis is continuing to work with agencies and growers to enact proactive strategies to reduce runoff from pesticides. We are also working with several aquatic toxicologists (and other scientists) to determine the real ecological risks to the waters of California from these low level, pulse detections of diazinon. Additionally, Novartis has completed the "*Investigation of Diazinon Occurrence, Toxicity, and Treatability in Southern United States Publicly Owned Treatment Works*" (a copy of this document was sent to you under a separate cover). The consumer education and stewardship program, which we spearheaded, in the Southwestern United States dramatically decreased the levels of pesticides detected in waste water treatment facilities. This program focused on education and stopping the disposal of pesticides down the drains.

Hopefully some of CalFed's concerns will be handled after they review the "*Ecological Risk Assessment for Diazinon*". Additional comments on this draft document may also be forthcoming from Dr. Dennis Tierney, Novartis Crop Protection, Inc., after he reviews the draft. We have scheduled a workshop for October 16, 1997, in Sacramento, to discuss this document. If you have any questions on our comments, please contact me at (916) 783-1834.

Sincerely,



DENNIS KELLY
State Government Relations Manager

cc: Dr. Dennis Tierney
Dr. Bryan Stuart, Dow Elanco
Dr. John Sanders, CDPR
Mr. Steve Shaffer, CDFA
Mr. Jim Gray, WCPA
Mr. Steve Murrill

(WINWORD/DENNIS/MEMOS/CAL-FED)